

**Emergency Action
to Temporarily Extend the
Sablefish Primary Fishery Season**

Supplemental Information Report

October 2021

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1. Introduction

On December 11, 2020, the National Marine Fisheries Service (NMFS) issued a final Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) pursuant to the National Environmental Act (NEPA) for the [Pacific Coast Groundfish Fishery 2021-22 Harvest Specifications and Management Measures](#); hereafter, “the 2021-22 EA”. Under NEPA, the longer-term framework and environmental impacts were disclosed in the Harvest Specifications and Management Measures for 2015-2016 and Biennial Periods Thereafter Final Environmental Impact Statement (EIS) (PFMC and NMFS 2015; hereafter, “the 2015-16 EIS”). The framework established a process by which NEPA documents for subsequent biennial periods would evaluate changes from the default harvest policies and environmental impacts that fell outside the range of impacts evaluated in the 2015 EIS.

The limited entry fixed gear (LEFG) sablefish primary (tier) fishery (hereafter, “sablefish primary fishery”) is managed under the Pacific Coast Groundfish Fishery Management Plan (PFMC 2019). The conditions of the groundfish fisheries and impacts to the affected environment were described in the 2015 EIS and the tiered 2021-22 EA. Based on a recommendation from the Pacific Fishery Management Council, NMFS is proposing to initiate an emergency rule to temporarily extend the sablefish primary fishery season from October 31, 2021 to December 31, 2021; and extend the period allowed for incidental halibut retention until noon local time on December 7, 2021.

The purpose of this supplemental information report is to determine whether there is a need for a supplemental NEPA analysis based on any changes in the proposed action, any significant new circumstances, or any significant new information that are relevant to environmental concerns and bear on the proposed action or its impacts (NOAA, 2017).

This Supplemental Information Report (SIR) is being prepared using the 2020 CEQ NEPA Regulations. The effective date of the 2020 CEQ NEPA Regulations was September 14, 2020, and reviews begun after this date are required to apply the 2020 regulations unless there is a clear and fundamental conflict with an applicable statute. 85 Fed. Reg. at 43372-73 (§§ 1506.13, 1507.3(a)). This SIR began on September 14, 2021 after the Council’s decision and accordingly proceeds under the 2020 regulations. The purpose of this SIR is to determine whether there is a need for a supplemental NEPA analysis based on substantial changes to the proposed action that are relevant to environmental concerns; or any significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. (40 CFR 1502.9(d)(1), CEQ 2020).

2. Background

The sablefish primary fishery is a limited access privilege program set up under Amendment 14 to the Pacific Coast Groundfish Fishery Management Plan (PCGFMP); which was approved by the Pacific Fishery Management Council (Council) in 2000 and was implemented by NMFS in 2001 (66 FR 41152;

August 2, 2001). Participants hold limited entry permits with a pot gear and/or longline gear endorsement and a sablefish endorsement. The fishery is prosecuted off the West Coast, north of 36° N. latitude.

Under Amendment 14, as set out in 50 C.F.R. § 660.231, the permit holder of a sablefish-endorsed permit receives a tier limit, which is an annual share of the sablefish catch allocation to this sector. NMFS sets three different tier limits (1, 2, and 3) through the biennial harvest specifications and management measures (for the 2020 limits, see 83 FR 63970, December 12, 2018); and up to three permits may be stacked at one time on a vessel participating in the fishery. Stacked tier limits are combined to provide a cumulative catch limit for that vessel. After vessels have caught their full tier limits, they are allowed to move into other fisheries for sablefish or other species, such as the daily trip limit (DTL) fishery or the open access (OA) fishery.

The sablefish primary fishery season has historically been open from April 1 through October 31 of each year since 2002, though individual permit holders may only fish up to their tier limits so may be required to cease fishing prior to October 31. These season dates were put into regulation during the development and implementation of the fishery under Amendment 14. Prior to that, the sablefish fishery had operated as a ‘derby’ style fishery, with a season length lasting a few weeks to a few days. Under Amendment 14, the fishery began operating under a seven month season. The seven month season structure, as opposed to a year-long season, was intended to allow for timely catch accounting so that the sector allocation was not exceeded.

Vessels using bottom longline gear in the sablefish primary fishery north of Point Chehalis, Washington are also allowed to retain incidentally caught Pacific halibut up to a specific limit specified at 50 C.F.R. § 660.231(b)(3)(iv). Pacific halibut are encountered regularly in the normal operation of the sablefish primary fishery due to the co-occurrence of halibut and sablefish in the same environments, and the design and function of fixed gear. Under current regulations, this retention is allowed until the sablefish primary season ends and it contributes additional economic value to this sector. Additionally, many vessels in the primary sablefish fishery also participate in sablefish and Pacific halibut fisheries in Alaska.

3. New Circumstances

At its September 2021 meeting, after evaluating the information provided to it, the Pacific Fishery Management Council recommended the National Marine Fisheries Service (NMFS) initiate an emergency action to extend the Sablefish Primary Fishery season from October 31, 2021, to December 31, 2021 to allow participants more time to harvest their full tier limits. As part of the emergency action, the Council also recommended an extension of the incidental halibut retention allowance north of Point Chehalis, Washington, until noon local time on December 7, 2021, the latest date allowed by the International Pacific Halibut Commission. The retention allowance ensures additional economic benefits and reduces regulatory discards of commercially valuable incidental halibut.

4. Consideration of New Circumstances and Information

The proposed action would provide an extension of the sablefish primary fishery season from October 31, 2021 through December 31, 2021. The action would not change 2021 sablefish harvest specifications, including annual catch levels (ACLs) or allocations, spatial footprint or gear used in this fishery. Thus, the analysis here focuses on whether the changes to the timing of the primary sablefish sector would have a detectable level of difference in impacts compared to those conditions analyzed in the 2015-16 EIS and tiered 2021-22 EA.

Socio-Economic Environment

Landings and Attainment

Between 2011 and 2019, the primary fishery has taken an average 64.4 percent of their allocation through mid-September. In comparison, the sablefish primary fishery in 2021 has only landed 42.2 percent of the allocation (Table 2 of [Agenda Item C.9.a, Supplemental GMT Report 1, September 2021](#)). Using the catch rates compared to the “normal” 2019 catch and a constant price at \$4,063 per mt, the Council’s Groundfish Management Team (GMT) estimated that approximately 678 mt of the sablefish primary allocation, an estimated value of \$2.76 million, would remain unharvested without a season extension. However, using the “low catch” rate of 2020, 518 mt of sablefish remain unharvested resulting in an ex-vessel value of \$2.4 million. While it is difficult to determine how many vessels would participate after October 31 or if trends will improve during the regular season, if the season were extended through December 31, it is likely that the fishery could take up to an estimated additional 20 percent of their primary sablefish allocation during the season extension (based on the 2020 Emergency Rule; Table 1 of [Agenda Item C.9.a, Supplemental GMT Report 1, September 2021](#)).

Number of vessels affected & projected to participate in extension

The percent vessel attainment distribution to date in 2021 has followed the trend of 2020 and is almost the reverse of prior years, with about twice the vessels at zero landings to date and half at full attainment. Further, 2021 has seen 14 fewer vessels participate through September 11th compared to the prior three year’s average of 69 vessels through September 14th (Table 1).

Table 1 (Updated). Number of vessels achieving given percent attainment of tiers through September 14 from 2017 to 2020 and through September 11 for 2021. Years with less than three vessels in an attainment bin were grouped to protect confidential data.

Percent Attainment through mid-September	Number of Vessels				
	2017	2018	2019	2020	2021
99-100	44	35	30	18	18
90-98	8	8	6	4	4
80-89	6	8	0		4
70-79		3	4	4	7

60-69	0	5	5		
50-59	4		3	3	5
<50	12	10	18	24	17
Zero Landings (Of Possible Vessels)	24	24	26	39	32
Total Vessels Participating through mid-September	74	69	66	53	55
Total Vessels Participated in Year	85	83	83	79	n/a
Total Vessels With Tier Permits	98	93	92	92	87

As shown in Table 1 of [Agenda Item C.9.a, Supplemental GMT Report 1, September 2021](#), 19 vessels took advantage of the 2020 Emergency Rule season extension, which amounted to 249.9 mt in landings and \$857,833 in revenue. A similar scenario is expected to happen if the season is extended in 2021. The higher percentage of pot landings compared to longline landings in November and December of 2020 is likely due to fewer longline vessels (10) participating during the season extension compared to the primary season (59). Comparatively, the majority of pot vessels that participated during the primary season also continued to participate during the season extension. Table 2 below is Table 1 from the GMT report reproduced here.

Table 2. Landings and number of vessels in the 2020 primary tier sablefish fishery during the standard primary season and the emergency rule extension by gear type used. 80.1 percent of total sablefish landings were landed before November and 19.9 percent were landed during the season extension.

	Primary Season (Before November)				Emergency Rule Extension (November and December)			
Gear	Landings (mt)	Percent of Season Landings (percent)	Ex-vessel Revenue	Number of Vessels	Landings (mt)	Percent of Extension Landings (percent)	Ex-vessel Revenue	Number of Vessels
<i>Pot</i>	327.36	32.6	\$1,043,358	13	205.83	82.4	\$701,626	9
<i>Longline</i>	676.80	67.4	\$2,435,391	59	44.04	17.6	\$156,207	10
Total	1,004.16		\$3,478,750	67 a/	249.87		\$857,833	19

a/ Some vessels fish for sablefish with both pot and longline gear.

Community Impacts

At the September 2021 Council meeting, the GMT estimated that if the sablefish primary fishery season closed on October 31, 2021, the fishery would only attain 64-72 percent of its allocation under the regular season structure resulting in ex-vessel revenue losses of over \$2 million as compared to if the full allocation was harvested, which would have corresponding impacts to the income and jobs across coastal communities in Washington, Oregon, and California. Each of the three states are likely to be affected to

some degree without a season extension, as the vessels and permits likely to be impacted are spread across the three states (Agenda Item C.9.a, Supplemental GMT Report 1, September 2021).

Table 3: 2015-2019 average revenue (2019\$), associated income impacts (2019\$) and number of jobs associated with the primary sablefish fishery, stratified by IOPAC (input-output model for Pacific Coast fisheries) port group for 2021 to date, 2020, and the 2015-2019 average.

Port Group	2021 to date		2020	Average 2015-2019 (2019\$)		
	Average Price	Revenue (millions)	Revenue (millions)	Revenue (millions)	Income Impacts (millions)	Jobs
Puget Sound	Conf.	Conf.	\$1.15	\$2.00	\$3.77	43
Washington Coast	\$1.83	\$0.27	\$0.21	\$1.45	\$2.09	39
Astoria-Tillamook	Conf.	Conf.	\$0.38	\$0.62	\$1.11	14
Newport	\$1.83	\$0.97	\$1.41	\$2.42	\$3.36	48
Coos Bay-Brookings	\$1.96	\$0.78	\$0.36	\$1.50	\$2.17	37
Crescent City-Eureka	\$2.09	\$0.32	\$0.38	\$0.44	\$0.49	10
Fort Bragg	\$1.36	\$0.25	\$0.30	\$0.56	\$0.70	26
San Francisco (incl. Bodega Bay)	\$2.75	\$0.03	Conf.	\$0.41	\$0.66	13
Monterey	\$2.21	\$0.21	Conf.	\$0.18	\$0.18	3
Total	\$1.84	\$3.26	\$4.34	\$9.57	\$14.53	233

Protected Resources

One of the primary areas for evaluation for this action is the potential interaction with protected resources in times not currently fished by the sablefish primary fishery. Given that protected species interactions are different between hook and line (bottom longline) gear and pot gear, this section provides an overview of the volume of landings and effort by gear type. Historically, based on the 10-year average of 2011-2019, the sablefish primary fishery operated using 25 percent pot gear versus 75 percent longline gear. In 2020, likely due to 82 percent of season extension landings being made by pot gear vessels, this total annual distribution shifted to 58 percent longline and 43 percent pot. Landing patterns by gear type in a 2021 extended season could be similar but will not be fully analyzed until 2022. Adding two additional months to the season increases the amount of time that vessels may be fishing on the water and therefore raises the potential for encounters with protected species. However, the sablefish primary fishery is managed with tiers that are restricted to a finite number of gear endorsements, and thus effort is also finite. Harvest levels, including ACLs, will remain the same as considered in the 2021-2022 EA. Overall, this suggests that if the season were extended, it's likely that the majority of the effort during the entire sablefish primary fishery season would occur via hook and line gear as it has in all prior years.

Humpback Whales

Numerous surveys, sightings, models, and tracking efforts on humpback whale migrations and behavioral patterns have found that presence of humpback whales along the West Coast is likely to be higher during the late spring through the fall. This reflects a general migration pattern of humpback whales heading south to breeding areas by December each year, and subsequently starting to return to feeding areas by April (Saez et al. 2020).

Whale density is highest along the West Coast while whales are on their feeding grounds. A recent study by Feist et al. (2021) used predictions of average whale density throughout the U.S. West Coast Exclusive Economic Zone (EEZ), which are based on a variety of environmental covariates as well as line-transect whale survey data collected from June through November at two to four year intervals from 1991 to 2009. The high whale density areas correspond to known, persistent feeding areas or Biologically Important Areas (BIAs) identified by Calambokidis et al (2015), which include five in California, one in Oregon, and one in Washington. Overall, in the period examined by Feist et al. (2021), most of the overlap in areas where pot gear vessels in the sablefish primary fishery fish with high whale density regions occurred off California with no overlap and minimal overlap in high whale density regions of Oregon and Washington, respectively.

In 2020, we consulted Drs. Karin Forney and Jarrod Santora (NOAA, SWFSC, September 25, 2020) to examine current ocean and ecosystem conditions and identify whether conditions may indicate a disruption in humpback whale migration and distribution. Based on reports of the continued high abundance of anchovy and data from whale watching and aerial surveys, it was determined that whales would likely be targeting the anchovy schools closer to the coast and should largely be gone by mid-November from coastal waters. Furthermore, given that sablefish pot gear is typically deployed in deeper outer slope habitat and in relatively low density (compared to Dungeness crab fishery), these researchers did not expect to see an increased risk of entanglement in the extension of the sablefish primary fishery season in 2020. Since similar conditions exist in 2021, with high populations of anchovy off the coast, we don't expect an increased risk of entanglement from the season extension in 2021. At a minimum, there should be fewer and less persistent high density whale aggregations into early-winter off the West Coast. While sub-adult animals may be present later in the year to feed on anchovy, they typically concentrate closer to the coast in the fall, especially in strong anchovy years (e.g. 2004-07; and 2016-2020). The best estimate is that even if humpbacks are present later into the fall this year, they should be concentrating on anchovy in coastal/shelf waters and not offshore along the outer slope.

We expect that the fishery will operate in the extended season as it does in the regular season as no new gear or fishing practices that would negatively impact whales are expected, overall effort is unchanged from the 2021-22 EA because neither the tier allocation nor the ACL is changing, and at least a portion of the effort shifted later in the year under an extended season would have otherwise occurred during the same time period but in different sectors (DTL and IFQ).

Given that humpback whales are generally moving out of the coastal areas between November and December period, there has been less fishing effort this year when whales are on feeding grounds along west coast (April-November), and the anticipated number and distribution of participating vessels does not represent a substantial increase in the concentration of pot gear, particularly in areas where

overwintering humpbacks may feed, we do not expect the risk to humpback whales during the emergency extension to be greater than conditions analyzed under the 15-16 EIS and 2021-22 EA.

Seabirds

Observed interactions with longline vessels in winter months with seabirds are lower than average compared to the rest of the year; however, this could be due to decreased abundance or the low observer coverage and effort in the fishery. With the implementation of requirements for vessels to deploy streamer lines or to night set year-round in 2020 (50 CFR 660.21), and no changes to gear configurations or fishing methods expected as part of this action, it is likely that encounter rates will remain similar to those noted in [Agenda Item I.4.a, NMFS Report 6, June 2020](#) ([Agenda Item C.9.a, Supplemental GMT Report 1, September 2021](#)) and to what was considered in the 2021-22 EA.

Salmon

Under the 2017 Biological Opinion, the non-whiting sector (which includes the sablefish primary fishery) has a bycatch guideline of 5,500 Chinook salmon and 560 coho salmon. Historically, the fixed gear fishery (including the sablefish primary fishery, DTL, and IFQ gear switching sectors) have had low Chinook bycatch. Based on Richerson, et al, 2019, the limited entry sablefish fishery has taken 10 coho in total from 2003-2018 and four unspecified salmon. As of September 20, 2021, the non-whiting sector is estimated to have caught only 16 percent of the Chinook salmon guideline, which includes an assumed catch of 527 Chinook salmon for the commercial non-trawl and recreational groundfish fisheries outside the salmon season ([Report IFQ21 from PacFIN APEX](#)). Given these trends, there is likely to be little to no impact beyond the scope of the 2021-22 EA to salmonid stocks by extending the tier season through the end of 2021.

Other Groundfish and Non-Groundfish Species

Yelloweye Rockfish

In 2021, the nearshore and non-nearshore fishery (of which the sablefish primary fishery season is a part) combined has an annual catch target (ACT) of 6.2 mt and a harvest guideline (HG) of 7.8 mt for yelloweye rockfish. Under the regular season structure, these fisheries are currently expected to take 3.9 mt of that allocation. While there is uncertainty around the potential additional bycatch that may occur with extending the season for the sablefish primary fishery, the GMT notes that it is unlikely that bycatch in the fishery would increase to a level that would risk exceedance of the ACT ([Agenda Item C.9.a, Supplemental GMT Report 1, September 2021](#)). Therefore, we expect there to be little to no impact beyond the scope of the 21-22 EA to yelloweye rockfish by extending the sablefish primary season through the end of 2021.

Other Groundfish/Non groundfish

Sablefish primary tier vessels are able to fish for and retain other groundfish species under the limited cumulative landing limits specified in Table 2 of 50 CFR 660.232. While there may be additional catch or bycatch of both groundfish and non-groundfish by extending the season through December 31, it is highly

unlikely that the extension would result in any risk to the non-trawl allocations or ACLs for those species caught in the tier fishery ([Agenda Item C.9.a, Supplemental GMT Report 1, September 2021](#)), and thus, impacts are expected to be similar to those analyzed in the 2020-21 EA.

Pacific Halibut

As of September 17, 2021, only 35,415 lb (51 percent) of the 70,000 lb allocation for Pacific halibut north of Pt. Chehalis has been caught in the sablefish primary fishery. Based on projections and given that the fishery is tracked with electronic fish tickets, it is unlikely that the fishery will exceed the 70,000 lb allocation with an additional 37 days added to the season. Halibut retention would still be prohibited south of Pt. Chehalis from November 1-December 7. After December 7th, all halibut caught would need to be discarded, both north and south of Pt. Chehalis (down to 36° N. lat). Halibut discard mortality rates vary by condition of those caught with hook and line gear (see Table 7 of [Agenda Item C.1.a, NWFSC Report 1, September 2020](#)) and are set at 18 percent for all pot gear. From 2011-2019, there has been no observed halibut bycatch with pot gear in the tier fishery and of those observed discards on hook and line vessels in the primary tier fishery, 88.1 percent north of Pt. Chehalis and 71.8 percent south of Pt. Chehalis were in injury status category of “minor”- which has an associated discard mortality rate of 0.04 (Table 62 of [Agenda item C.1.a, NWFSC Report 2, September 2020](#)).

As described in [Agenda Item D.7.a., Supplemental GMT Report 1, September 2020](#), there are little seasonal differences in bycatch rates of Pacific halibut throughout the sablefish primary fishery season, so while there is not specific historical information on the halibut bycatch rates in the sablefish primary fishery in November and December, this suggests that overall bycatch would likely be similar to past years as effort would not be higher in 2021 under the season extension, just spread out over two months longer. Therefore, NMFS believes that bycatch and associated discard mortality of Pacific halibut would likely not be higher than that assumed by IPHC in setting their specifications for 2021 and thus impacts are expected to be similar to those analyzed in the 2021-22 EA.

Observer Coverage

As discussed in [Agenda Item C.9.a, Supplemental GMT Report 1](#), there would be some increased uncertainty in the 2021 mortality estimates of discard species under the extension of the primary season through December 31, 2021 due to lower observer coverage rates. However, the risk of exceeding catch limits for these species is extremely low given there will be some level of observer coverage in place for the sablefish primary fishery vessels fishing during the emergency extension and there has been lower levels of fishing effort (and catch) of these species to date this year. Additionally, other catch reporting mechanisms, such as electronic fish ticket system (ETix) will continue to be in place to provide near real-time accounting of sablefish catch during the extended period. Overall, the effects of this season extension on catch accounting are expected to be within those disclosed in the 2021-22 EA.

5. No Changes in Environmental Impacts

For all other environmental components included in the 15-16 EIS and 21-22 EA not discussed above, within the following resource categories: essential fish habitat; California Current Ecosystem; groundfish; protected and prohibited species; non-groundfish species, other than protected resources, caught in

groundfish fisheries; and the socioeconomic environment including fishing communities; the new circumstances described in this document are not expected to change the environmental impacts considered in the 15-16 EIS and 2021-22 EA.

6. Conclusion

The proposed action would extend the sablefish primary tier fishery season, which shifts the timing of some of the expected 2021 fishing effort to November and December. Without this action, the sablefish primary fishery would not attain their allocation and could incur upwards of approximately \$2 million loss in ex-vessel revenue as compared to if the full allocations were harvested, with even greater impacts to West Coast communities. The overall effort in the sablefish primary fishery will remain within the range analyzed in the 2021-22 EA, with the overall catch of sablefish, incidental halibut, and other bycatch species (such as yelloweye rockfish) remaining below the 2021 harvest specifications and allocations. Impacts to protected species, including humpback whales, seabirds and salmon, are projected to be within the conditions analyzed under the 2021-22 EA. Socio-economic benefits are expected to remain below the estimates provided in the 2021-22 EA.

It is difficult to predict what the exact spatial distribution of fishing effort would be during the season extension. However, examining historical observer data, landings data, and given the composition of vessel ownership of those vessels most likely to benefit from a season extension, it is most likely that the majority of effort would occur off the coasts of Washington and Oregon. Effort in this area would not be new as IFQ fixed gear vessels, targeting sablefish north of 36 N. lat. primarily, tend to have higher landings in the fall and winter months in the same areas and use the same gear type as vessels in the primary fishery.

In terms of potential interactions with protected resources, including ESA-listed species, impacts are projected to be within those disclosed under the 2021-22 EA. There are limited to no interactions with salmonids in this fishery and given recent mitigation measures requirements for longline vessels (of which the majority of primary tier vessels are), there are likely no additional impacts to seabirds. Finally, a relatively small proportion of the sablefish primary fishery fleet uses pot gear. Humpback whales are generally moving out of the west coast area between November and December period. There has been less fishing effort this year during the time when whales are on feeding grounds along west coast and there is a higher risk of entanglement, and the anticipated number and distribution of participating vessels would not represent a substantial increase in the concentration of pot gear, particularly in areas where overwintering humpbacks may feed. Therefore, we do not expect the impact to humpback whales during the emergency extension to be greater than conditions analyzed under the 15-16 EIS and 2021-22 EA.

NMFS considered the proposed action and analyzed whether the resulting effects constitute a substantial change on protected resources and other groundfish and non-groundfish resources. In this case, NMFS finds no substantial change in effects related to the proposed action. Therefore, NMFS has determined that there is no need to supplement the 2021-22 EA because: (1) the updates to the proposed action that are relevant to environmental considerations are not substantial; and (2) the new circumstances or information relevant to environmental concerns and bearing on the updated proposed action or its impacts are not significant under NEPA.

6. List of Preparers

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7. References

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